

1      Presented to the Court by the foreman of the  
2      Grand Jury in open Court, in the presence of  
3      the Grand Jury and FILED in The U.S.  
4      DISTRICT COURT at Seattle, Washington.

5      *August 16, 2007*  
6      BRUCE RIFKIN, Clerk  
7      By *[Signature]* Deputy

8      UNITED STATES DISTRICT COURT  
9      WESTERN DISTRICT OF WASHINGTON  
10     AT SEATTLE

11     UNITED STATES OF AMERICA,

12     Plaintiff,

13     v.

14     HRANT "MIKE" ASLANYAN,  
15     a/k/a Mike Ascanyan,  
16     a/k/a Hvant Aslanyan,

17     Defendant.

CR07 0294 RSM

18     } INDICTMENT



19     } 07-CR-00294-INDI

20     The Grand Jury charges that:

21     **COUNT ONE**

22     **(Bank Fraud)**

23     **A. The scheme and Artifice to Defraud.**

24     1. Beginning on a date unknown, but within the last five years, and  
25     continuing through on or about August 15, 2006, at Redmond, within the Western  
26     District of Washington and elsewhere, HRANT "MIKE" ASLANYAN, and others  
27     known and unknown, did knowingly and willfully devise and execute a scheme and  
28     artifice to defraud financial institutions as defined by Title 18, United States Code,  
   Section 20, including but not limited to Bank of America, U.S. Bank, Group Health  
   Credit Union (GHCU), Washington Mutual (WAMU) and Boeing Employee's Credit  
   Union (BECU), and to obtain monies, funds and credits under the custody and control

1 of said financial institutions by means of false and fraudulent pretenses, representations  
 2 and promises, as further described below.

3       2. The essence of the scheme to defraud was for HRANT "MIKE"  
 4 ASLANYAN and others known and unknown to obtain cash and other things of value  
 5 from financial institutions and merchants by fraudulently obtaining credit card and debit  
 6 card numbers (hereafter, collectively referred to as "access devices"), as well as  
 7 Personal Identification Numbers (PINs), belonging to real individuals. This  
 8 information was then used in unauthorized credit and debit card transactions with the  
 9 purpose of fraudulently obtaining currency and merchandise.

10 **C. The Scheme and Artifice to Defraud.**

11       3. It was part of the scheme and artifice to defraud that at all times relevant  
 12 to this indictment, HRANT MIKE ASLANYAN owned and operated a retail business  
 13 commonly known as "Smoker's Choice" in Redmond, Washington. As the owner and  
 14 operator, HRANT MIKE ASLANYAN would routinely process customer transactions  
 15 that were paid for using access devices. When processing these legitimate transactions,  
 16 HRANT MIKE ASLANYAN would also wrongfully run the access device through a  
 17 "skimmer" designed to capture the unique card number and other information encoded  
 18 on the magnetic strip on the access device. In total, HRANT MIKE ASLANYAN  
 19 compromised approximately 300 separate access device accounts. Representative  
 20 examples include, but are not limited to, the following:

21 <b>Account Holder</b>	22 <b>Issuing Financial Institution</b>	23 <b>Approximate Date</b>
24 L.R.	25 GHCU	6/8/06
26 H.O-B	27 WAMU	6/22/06
28 T.H.	BECU	6/16/06
A.M.	Bank of America	7/6/04
D.P.	U.S. Bank	7/7/06

4. It was further part of the scheme and artifice that HRANT MIKE  
 ASLANYAN would wrongfully divert these access card numbers and other confidential

1 information to other participants in the scheme, who in turn used these access card  
 2 numbers and PINs to fraudulently withdraw cash from the associated accounts at the  
 3 financial institutions and/or to purchase merchandise, all without the authorization of  
 4 the legitimate account holder. The other participants wrongfully obtained cash and  
 5 goods worth in excess of \$250,000. Representative examples include, but are not  
 6 limited to, the following:

Account Holder	Issuing Bank	Location	Date	Amount
L.R.	GHCU	Las Vegas, NV	8/2/06	\$202.02
H.O-B	WAMU	Las Vegas, NV	8/2/06	\$202.02
T.H.	BECU	Hawthorne, CA	7/31/06	\$500
T.H.	BECU	N. Hollywood, CA	8/1/06	\$500
A.M.	Bank of America	Las Vegas, NV	8/4/06	\$262
D.P.	U.S. Bank	Las Vegas, NV	8/6/06	\$508

13 **C. Execution of the Scheme and Artifice to Defraud.**

14 5. On or about the dates set forth below, within the Western District of  
 15 Washington, and elsewhere, for the purpose of executing and attempting to execute the  
 16 aforementioned scheme and artifice to defraud financial institutions, and to obtain  
 17 money and property from said financial institutions by means of false and fraudulent  
 18 pretenses, including, but not limited to, fraudulently utilizing credit and/or debit cards  
 19 issued by said financial institutions without the authorization of the lawful account  
 20 holders, HRANT "MIKE" ASLANYAN did knowingly cause, aid, and abet the  
 21 following transactions:

22 a. On or about June 8, 2006, 2006, HRANT "MIKE" ASLANYAN  
 23 wrongfully captured and diverted access device information on an access device issued  
 24 by GHCU to L.R.

25 b. On or about August 2, 2006, HRANT "MIKE" ASLANYAN  
 26 caused, aided, and abetted another participant in the scheme in using the GHCU access  
 27 device issued to L.R. in Las Vegas, Nevada, to withdraw \$202.02 from L.R.'s bank  
 28

1 account.

2 All in violation of Title 18, United States Code, Sections 1344 and 2.

3 **COUNT TWO**

4 **(Aggravated Identity Theft)**

5 On or about July 6, 2006, at Redmond within the Western District of  
6 Washington, HRANT "MIKE" ASLANYAN knowingly transferred, possessed and  
7 used, without lawful authority, a means of identification of another person, that is, a  
8 credit card number issued to A.M. by Bank of America, card number XXXX-XXXX-  
9 XXXX-0500, during and in relation to a felony listed in Title 18, United States Code,  
10 Section 1028A(c), to wit: Bank Fraud, in violation of Title 18, United States Code,  
11 Section 1344, as alleged in Count One.

12 All in violation of Title 18, United States Code, Section 1028A.

13

14 A TRUE BILL:

15 DATED: *8/16/07*

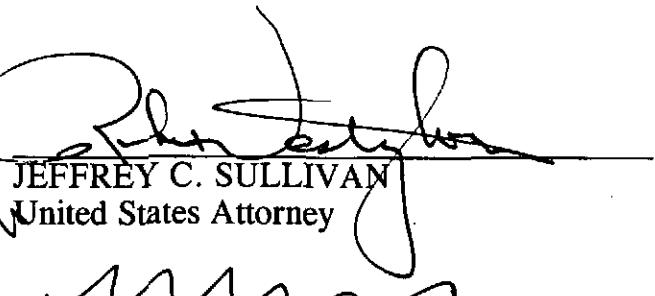
16 *Signature Redacted Pursuant to*  
17 *Judicial Conference Policy*

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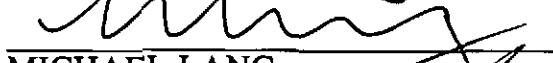
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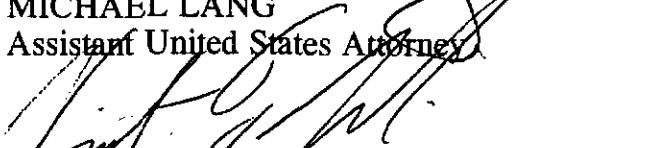
FOREPERSON

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